IN THE DISTRICT COURT OF THE UNITED STATES

FOR THE WESTERN DISTRICT OF NORTH CAROLINA

Case No.

UNITED STATES OF AMERICA )

) STANDARD CRIMINAL

v. ) PRETRIAL MOTIONS

)

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ )

 Now comes counsel for the defendant \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

and herewith files the following criminal pretrial motions as permitted by this Court’s Miscellaneous Order Number 2390 and as indicated below:

[check appropriate box(es)]:

[ ] All pretrial motions contained in the list below. (Text of all motions is on file with the Court as an attachment to Miscellaneous Order No. 2390.)

[ ] Only those discovery motions indicated by a check mark below. (Text of all motions is on file with the Court as an attachment to Miscellaneous Order No. 2390.)

[ ] All discovery motions indicated by a check mark below plus the additional discovery motions attached to and filed with this form motion.

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NOTE: Motions to Suppress, Dismiss, Sever, and other motions more unique to a particular case should be filed separately. Although use of this form is voluntary, the court encourages counsel to use this procedure to avoid unnecessary docketing and filing of lengthy and numerous boilerplate pretrial motions. Counsel are further requested to review the government’s open file before filing additional motions.

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List of Motions

[ ] 1. Motion for Discovery and Inspection and to Require the Government to Disclose all Exculpatory Evidence

[ ] 2. Motion for Brady and Other Favorable Materials, and Incorporated Memorandum of Law

[ ] 3. Motion for the Disclosure of “Similar” or “Extrinsic Act” Evidence, F.R.E. 803 (24) Evidence, F.R.E. 804 (5) Evidence and Brief in Support Thereof

[ ] 4. Motion for Disclosure of Rule 404(b) Evidence and Incorporated Memorandum of Law

[ ] 5. Request for Notice of Government’s Intention to Use Evidence

[ ] 6. Motion Pursuant to 18 U.S.C. §3504 for Disclosure of Electronic or Other Surveillance and for Establishing Evidence Under 18 U.S.C. §2518(8)(d), (9) and (10), and Memorandum of Law in Support Thereof

[ ] 7. Motion for Access to Original Tape Recordings

[ ] 8. Motion to Preserve Evidence and Incorporated Memorandum of Law

[ ] 9. Motion for Government Agents to Retain Rough Notes and Incorporated Memorandum of Law

[ ] 10. Motion to Compel Government to Announce, in Advance of Trial, Whether It Intends to Use Post-Arrest and/or Post Conspiracy Statements (Redacted or Otherwise) of Co-Defendants and Incorporated Memorandum of Law.

[ ] 11. Motion for Pre-Trial Hearing to Determine Whether Government has Sufficient Independent Evidence of Conspiracy to Warrant Admission of Alleged Co-Conspirator Statements

[ ] 12. Motion to Require Government to Submit Defendant’s Pre-and Post-Arrest Statements Prior to Trial and Incorporated Memorandum of Law

[ ] 13. Motion for Statements of Indicted and Unindicted Co-Defendants and Alleged Co-Conspirators

[ ] 14. Motion for Production of All Interview Statements of Witnesses that the Government Does Not Intend to Produce at Trial and Incorporated Memorandum of Law

[ ] 15. Motion for Production of Psychiatric Evaluation and Other Evidence of Emotional Disorder of Any Government Witness and Incorporated Memorandum of Law

[ ] 16. Motion for Order Requiring Government to State Whether It Intends to Call Confidential Informant and Incorporated Memorandum of Law

[ ] 17. Motion for List of Witnesses and Incorporated Memorandum of Law

[ ] 18. Motion for Order Requiring Government to Produce Government Witnesses for Defense Interview and Incorporated Memorandum of Law

[ ] 19. Motion to Compel Early Production of Grand Jury Testimony and Incorporated Memorandum of Law

[ ] 20. Motion for Recorded Testimony of Grand Jury Witnesses Pursuant to F.R.Cr.P. 16(a)(1)(A)

[ ] 21. Motion for Disclosure of Grand Jury Witnesses and Documents Pursuant to F.R.Cr.P. 6(e)(3)(C)

[ ] 22. Motion for Information Obtained in Violation of Attorney/Client Privilege

[ ] 23. Motion Requiring Government to Admit or Deny the Existence of Other Investigation and Potential Indictments

[ ] 24. Motion for Leave to File Further Motions

[ ] 25. Motion for Disclosure of Guidelines Sentencing Information Prior to Plea Agreement Deadline

[ ] 26. Motion for Discovery and to Require the Government to Disclose All Exculpatory Evidence

This the \_\_\_\_\_\_\_\_ day of \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, 20\_\_\_\_\_.

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Counsel for Defendant\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_